

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**NOTICE OF APPEARANCE AND
REQUEST FOR SERVICE OF NOTICES AND PAPERS**

PLEASE TAKE NOTICE that Pashman Stein Walder Hayden, P.C., Bernstein Litowitz Berger & Grossmann LLP, and Pomerantz LLP hereby enter their appearance (the “Notice of Appearance”) in the above-captioned cases as counsel to Benjamin Hebert (“Hebert”) and Atri Amin (“Amin”), on behalf of themselves and similarly situated stockholders of Lordstown Motors Corp. f/k/a DiamondPeak Holdings Corp., pursuant to section 1109(b) of title 11 of the United States Code, rules 2002, 3017(a), 9007, and 9010 of the Federal Rules of Bankruptcy Procedure (as amended, the “Bankruptcy Rules”), and rule 2002-1(d) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, and request that copies of any and all notices and papers filed or entered in these cases be given to and served upon the following:

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

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PLEASE TAKE FURTHER NOTICE that this constitutes not only a request for service of the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, a request for service of all orders and notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand delivery, telephone, facsimile transmission, email or otherwise, (1) affects or seeks to affect in any way any rights or interests of any creditor or party in interest in this case, with respect to (a) the debtors in the above-captioned cases (the “Debtors”) and any related adversary proceedings, whether currently pending or later commenced, (b) property of the Debtors’ estates, or proceeds thereof, in which the Debtors may claim an interest, or (c) property or proceeds thereof in the possession,

custody, or control of others that the Debtors may seek to use, or (2) requires or seeks to require any act or other conduct by a party in interest.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and any subsequent appearance, pleading, claim, or suit is not intended nor shall be deemed to waive the rights of Hebert or Amin: (1) to have an Article III judge adjudicate in the first instance any case, proceeding, matter, or controversy as to which a bankruptcy judge may not enter a final order or judgment consistent with Article III of the United States Constitution; (2) to have final orders in a non-core case, proceeding, matter, or controversy entered only after an opportunity to object to proposed findings of fact and conclusions of law and a de novo review by a district court judge; (3) to trial by jury in any case, proceeding, matter, or controversy so triable; (4) to have the reference withdrawn by the United States District Court in any case, proceeding, matter, or controversy subject to mandatory or discretionary withdrawal; or (5) any other rights, claims, actions, defenses, setoffs, or recoupments to which Hebert or Amin is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved.

Dated: July 7, 2023
Wilmington, Delaware

PASHMAN STEIN WALDER HAYDEN, P.C

/s/ Joseph C. Barsalona II

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*Counsel to Benjamin Hebert and Atri Amin on behalf of
themselves and similarly situated stockholders of Lordstown
Motors Corp. f/k/a DiamondPeak Holdings Corp.*

CERTIFICATE OF SERVICE

I, Joseph C. Barsalona II, hereby certify that on July 7, 2023, I caused a copy of the foregoing *NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF NOTICES AND PAPERS* to be served on all parties who are scheduled to receive notice through the Court's ECF system.

PASHMAN STEIN WALDER HAYDEN, P.C.

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